

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---|----------|----------------------------|
| LAWRENCE J. KEOHANE, JR., and | : | CIVIL ACTION |
| PATRICIA M. KEOHANE, Administrators | : | |
| for the Estate of JOSEPH P. KEOHANE, | : | NO. 07-3175 |
| : | | |
| Plaintiffs, | : | |
| : | | |
| v. | : | |
| : | | |
| CARRIE McWILLIAMS, et al. | : | |
| : | | |
| Defendants. | : | JURY TRIAL DEMANDED |

JOINT PROPOSED JURY INTERROGATORIES/VERDICT FORM

We, the jury, unanimously find the following by a preponderance of the evidence:

QUESTION 1:

Was the Decedent, Joseph Keohane particularly vulnerable to suicide?

Answer: No ____

Yes ____

If your answer to Question 1 is “NO,” you have completed your deliberations. Please sign the verdict sheet on the last page and notify the courtroom deputy you have completed your deliberations. If you have answered “YES” to Question 1, please proceed to Question 2.

QUESTION 2:

Did Defendant Carrie McWilliams know, or should she have known of Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 2 is "NO," please proceed to Question 5. If you have answered "YES" to Question 2, please proceed to Question 3.

QUESTION 3:

Was Defendant Carrie McWilliams deliberately indifferent to Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 3 is "NO," please proceed to Question 5. If you have answered "YES" to Question 3, please proceed to Question 4.

QUESTION 4:

Were the actions of Defendant Carrie McWilliams the proximate and legal cause of Joseph Keohane's suicide?

Answer: No _____

Yes _____

Please proceed to Question 5.

QUESTION 5:

Did Defendant Edward Sutton know, or should he have known of Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 5 is "NO," please proceed to Question 8. If you have answered "YES" to Question 5, please proceed to Question 6.

QUESTION 6:

Was Defendant Edward Sutton deliberately indifferent to Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 6 is "NO," please proceed to Question 8. If you have answered "YES" to Question 6, please proceed to Question 7.

QUESTION 7:

Were the actions of Defendant Edward Sutton the proximate and legal cause of Joseph Keohane's suicide?

Answer: No _____

Yes _____

Please proceed to Question 8.

QUESTION 8:

Did Defendant Brian Weaver know, or should he have known of Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 8 is "NO," please proceed to Question 11. If you have answered "YES" to Question 8, please proceed to Question 9.

QUESTION 9:

Was Defendant Brian Weaver deliberately indifferent to Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 9 is "NO," please proceed to Question 11. If you have answered "YES" to Question 9, please proceed to Question 10.

QUESTION 10:

Were the actions of Defendant Brian Weaver the proximate and legal cause of Joseph Keohane's suicide?

Answer: No _____

Yes _____

QUESTION 11:

Did Defendant Robert Doe know, or should he have known of Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 11 is "NO," please proceed to Question 14. If you have answered "YES" to Question 11, please proceed to Question 9.

QUESTION 12:

Was Defendant Robert Doe deliberately indifferent to Joseph Keohane's particular vulnerability to suicide?

Answer: No _____

Yes _____

If your answer to Question 12 is "NO," please proceed to Question 14. If you have answered "YES" to Question 12, please proceed to Question 13.

QUESTION 13:

Were the actions of Defendant Robert Doe the proximate and legal cause of Joseph Keohane's suicide?

Answer: No _____

Yes _____

If you answered no to questions 2 through 10, you do not need to answer any of the remaining questions and can return to the courtroom. If you answered yes to questions 2,3,4,5,6, 7, 8, 9, 10, 11, 12, or 13 please proceed to Question 14.

QUESTION 14

Please state what amount, if any, that will fairly compensate the estate of Joseph Keohane and plaintiffs Larry and Patricia Keohane for any injury actually sustained as a result of Defendants' conduct.

Answer: \$_____ (Fill in dollar figure)

After answering Question 14, you have completed your deliberations. Please sign the verdict sheet on the last page and notify the courtroom deputy you have completed your deliberations.

SO SAY WE ALL, this _____ day of _____ 2011.

Foreperson

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of November 2011, the Proposed Joint Jury Interrogatories was filed electronically and is available for viewing and downloading from the ECF system:

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/s/ David A. Gomez

David A. Gomez